

# JacksonLewis

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March 14, 2025

**VIA ECF**

Hon. Vernon S. Broderick, U.S.D.J.  
U.S.D.C. for the S.D.N.Y.  
40 Foley Square, Courtroom 518  
New York, NY 10007

**Re: *Cooper v. Mass Appeal Media Inc., et al.***  
**23 Civ. 9115 (VSB) (BCM) – Joint Status Letter**

Dear Judge Broderick:

We represent all Defendants in the above-referenced action. We write, jointly with Plaintiff's counsel, in response to the Court's Order at ECF No. 39 to provide a joint status update and proposed summary judgment briefing schedule.

On February 12, 2025, the parties participated in a settlement conference before Judge Moses. Although the parties attempted to resolve the case in good faith, they were ultimately unable to do so. Accordingly, the parties propose the following briefing schedule for Defendants' anticipated motion for summary judgment:

- Defendants' moving papers by **April 16, 2025**
- Plaintiff's opposition papers by **May 16, 2025**
- Defendants' reply papers by **June 13, 2025**

The parties thank the Court for its time and consideration of the above.

Respectfully submitted,

/s/ Dana G. Weisbrod  
Dana G. Weisbrod  
Leo T. Ernst

Cc: Plaintiff's counsel (via ECF)